

REMARKS

This Amendment is submitted in response to the Office Action dated August 11, 2004, having a shortened statutory period set to expire November 11, 2004. Claims 21-40 are pending.

Applicants appreciate the teleconference held with the Examiner on October 26, 2004. No agreement was reached during that teleconference.

REJECTIONS UNDER 35 U.S.C. § 103

In the present Office Action, Claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouckman et al. (U.S. Patent No. 6,134,307 – “*Brouckman*”) in view of Gallagher et al. (U.S. Patent No. 5,907,603 – “*Gallagher*”). Claims 1-20 are cancelled, and thus these rejections are moot.

Although Claims 1-20 are cancelled, Applicants do not believe that *Brouckman* or *Gallagher* are applicable prior art with reference to the pending claims.

Brouckman teaches a method for classifying and storing call records in a global telecommunications network. The call records (Call Detail Records – CDR) are reviewed to ensure that they “are valid and comply with industry standards. It then translates this input into an industry standard format called Data Message Handling (DMH)” (*Brouckman* col. 5, lines 12-15). The call events classify the incoming call records as either 1) a valid record (no errors in key fields); 2) an original CDR record; 3) an invalid record that cannot be further processed; or 4) an event record containing information needed for billing (*Brouckman* col. 8, lines 52-65).

Gallagher teaches a method for extracting fields from a first data structure and inserting them into predetermined locations in a second data structure (*Gallagher* col. 4, lines 14-20), such that the predetermined location is determined by the type of record in the field (*Gallagher* col. 4, lines 31-33). Specifically, placement in the second data structure is according to a Field

Definition Table (FDT) (*Gallagher* col. 5, lines 3-4). The format for the field in both the first and second data structure are defined in a Field Translation Table (*Gallagher* col. 5, lines 18-23).

With reference to exemplary Claim 21, the cited prior neither teaches nor suggests:

receiving call data at a local network from a foreign telecommunications network, wherein the call data is from a source file having multiple source fields created in the foreign telecommunications network (See Figure 5 of the present specification), and wherein the call data is for a call made by a user who is registered with the local telecommunications network but who made the call using the foreign telecommunications network (See page 5, lines 11-13 of the present specification);

validating the received call data by confirming that each source field in the received call data complies with a first user-defined format (See page 8, lines 5-8 of the present specification); and

in response to validating the received call data, selectively converting the received call data into a target file having multiple target fields using a second user-defined format that is specific for the local telecommunications network, wherein each target field conforms to the second user-defined format (See page 9, lines 7-15 of the present specification).

Regarding the feature of “validating the received call data by confirming that each source field in the received call data complies with a first user-defined format,” *Brouckman* teaches only the step of ensuring that call detail records are “valid and comply with an industry standards” (*Brouckman* col. 5, line 13). There is no suggestion that the call detail records “comply with” a particular format. Even if this interpretation of the terms “valid and comply” were deemed to mean “complying with a particular format,” there is no teaching or suggestion of using a “user-defined format” by which the data is judged. *Gallagher* does not mention validating incoming data at all.

Regarding the feature of “selectively converting the received call data into a target file having multiple target fields using a second user-defined format that is specific for the local telecommunications network, wherein each target field conforms to the second user-defined

format,” *Brouckman* teaches translating local data into “an industry standard format called Data Message Handling (DMH)” (*Brouckman* col. 5, lines 13-15). Note that DMH files are used only for processing billing records (*Brouckman* col. 4, lines 65-66; col. 9, lines 48-49). (See Claim 28 in the present amendment.) *Gallagher* performs no data translation/conversion.

With reference to exemplary Claim 22, the cited prior art does not teach or suggest “validating the received call data by using the received call data as an input for a software program, wherein the received call data is validated only if the software program produces a validating result” (See page 8, lines 11-12 of the present specification). While *Gallagher* does reference a “data conversion routine” for a source structure (*Gallagher* col. 5, lines 18-23), there is no teaching or suggestion that this “routine” is used to validate the source structure. Neither is there any teaching or suggestion of using “the validating result” to populate a target field in the target file (Exemplary Claim 23 in the present amendment).

With reference to exemplary Claim 24, the cited prior art does not teach or suggest “wherein the second user-defined format is a sum of two or more of the source fields in the source file for the received call data” (See page 9, line 11 of the present specification).

With reference to exemplary Claim 25, the cited prior art does not teach or suggest “wherein the second user-defined format for a field in the target file is a default value that is independent of a corresponding source field in the source file for the received call data” (See page 9, line 12 of the present specification).

With reference to exemplary Claim 26, the cited prior art does not teach or suggest “wherein the first user-defined format has multiple validation rules, and wherein each of the multiple validation rules are sequentially applied to the call data, and wherein each of the source fields in the source file for the call data is validated only that source field complies with every applicable validation rule from the multiple validation rules” (See page 10, lines 5-8 of the present specification). Rather, *Gallagher* teaches that each field can have only one type definition (*Gallagher* col. 4, lines 31-33).

With reference to exemplary Claim 27, the cited prior art does not teach or suggest “outputting an error message to the foreign telecommunications network if a source field in the source file fails a validation test” (See page 10, lines 19-20 of the present specification).

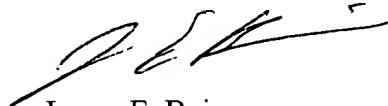
With reference to exemplary Claim 28, the cited prior art does not teach or suggest “wherein the target file is used exclusively for non-billing operations” (See, for example, the “Year/Month/Day” format described on page 8, line 10 of the present specification). Rather, *Brouckman* teaches that the converted target files are used only for processing billing records (*Brouckman* col. 4, lines 65-66; col. 9, lines 48-49).

CONCLUSION

Applicants now respectfully request a Notice of Allowance for all pending claims.

No extension of time for this response is believed to be necessary. However, in the event an extension of time is required, that extension of time is hereby requested. Please charge any fee associated with an extension of time as well as any other fee necessary to further the prosecution of this application to **IBM CORPORATION DEPOSIT ACCOUNT No. 09-0457**.

Respectfully submitted,



James E. Boice
Registration No. 44,545
DILLON & YUDELL LLP
8911 North Capital of Texas Highway
Suite 2110
Austin, Texas 78759
512.343.6116

ATTORNEY FOR APPLICANT(S)

IN THE DRAWINGS

Please substitute the enclosed Replacement Sheet for FIG. 5 and FIG. 6 for the originally filed sheet. FIG. 6 has been amended to correct a typographical error in the original, in which target data record structure definition 60 was originally labeled as “SOURCE RECORD STRUCTURE.” FIG. 6 has been amended to use the correct label of “TARGET RECORD STRUCTURE.” No new matter is added.